

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
(HARRISBURG)**

<hr/> <b>In Re:</b>	:
	:
<b>Wesley Matthew Kunkel</b>	: <b>Chapter 13</b>
	: <b>Case No. 1:23-bk-01205-HWV</b>
	:
<b>Debtor</b>	: <b>11 U.S.C. §362(d)</b>
	:
<hr/> US Bank Trust National Association,	:
Not In Its Individual Capacity But Solely	:
As Owner Trustee For VRMTG Asset Trust	:
	:
Movant	:
v.	:
	:
Wesley Matthew Kunkel	:
	: Hearing: February 6, 2024 at 9:30 a.m.
Debtor	:
and	:
	:
Jack N. Zaharopoulos, Esquire	:
Trustee	:
	:
Respondents	:

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

**US BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET TRUST** has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court which seeks the termination of the Automatic Stay instituted at the commencement of your Chapter 13 Bankruptcy proceeding.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **January 23, 2024**, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court  
Sylvia H. Rambo U.S. Courthouse  
1501 North 6th Street  
Harrisburg, PA 17102

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney and the Chapter 13 Trustee:

Brian E. Caine, Esq.  
Attorney for Movant  
Parker McCay P.A.  
9000 Midlantic Drive, Suite 300  
Mount Laurel, NJ 08054

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
717-566-6097

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Chief Judge Henry W. Van Eck, on **February 6, 2024 at 9:30 a.m.** in United States Bankruptcy Court, Sylvia H. Rambo U.S. Courthouse, 1501 North 6th Street, 4<sup>th</sup> Floor, Courtroom #8, Harrisburg, PA 17102.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 717-901-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: January 9, 2024

By: /s/ BRIAN E. CAINE  
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